



The Masten Law Firm
4900 Fourace Place
Suite 414
Houston, Texas 77401

August 3, 2023

Attention: Jeremy Matsen Esquire

Re: John T. Lamont and Preston Poulter v. Ethan Van Sciver; John does and XYZ Corps 1-10

Docket No: BUR-L-689-22

Dear Mr. Matsen,

Thank you for the opportunity to assist you in this matter. Please accept this correspondence as my report in the above-captioned matter.

The requested scope of work for which I was retained was to perform a security vulnerability needs assessment including providing estimated costs of a conceptual security plan for the protection of Mr. Preston Poulter (plaintiff) and Mr. John T. Lamont (plaintiff) who were falsely labeled as “Pedophiles” and “Child Pornographers” by Ethan Van Sciver (defendant).

Prior to reaching any findings, conclusions, and opinions, I reviewed the following provided material:

1. First Amended Complaint and Jury Demand

In addition to the reviewing the provided civil complaint listed above, I also interviewed plaintiff Preston Poulter and relied upon my thirty-year career as a security practitioner in the security and executive protection industry, my professional certification, my formal education and the following Supplemental Materials prior to rendering my findings, conclusions and opinions:

- “Introduction to Security”, Seventh Edition, written by Robert J. Fisher & Gion Green, Published 2002 by Elsevier, Buttersworth & Heineman;
- “ASIS Protection of Assets Manual” 2004 with revisions;
- “Violence The Enduring Problem” Third Edition, Authored by Alex Alvarez and Ronet Bachman, Published 2017 by Sage Publications Inc.;
- “Criminal Violence. Patterns Explanations and Interventions” Authored by Marc Riedel and Wayne Welsh. Published 2016 by Oxford University Press; and

- “Encyclopedia of Security Management-Techniques and Technology” Authored by John J. Fay, Published 1993 by Butterworth-Heineman.

Expert Witness Background and Qualifications

I am a self-employed security and risk management consultant. Prior to becoming an independent security and risk management consultant, I enjoyed a thirty-year professional career during which I held private sector security and executive leadership positions in large hospitality and gaming operations. My responsibilities while employed by various employers included performing security functions, training and managing proprietary security forces, overseeing contracted security services, and off-duty special employment law enforcement officers. I’ve attached my curriculum vitae to this report for specific details of my education, professional experience, professional associations, and course summary.

My professional security experience started in 1980 as a line construction site-security officer for Golden Nugget Casino in Atlantic City, New Jersey and culminated with Wynn in 1990 as the Director of Security for Golden Nugget, Las Vegas. In 1991, I began my employment with Trump Gaming as the Vice-President of Security at the Trump Taj Mahal casino/resort in Atlantic City, New Jersey and left Trump in 2010 with the rank of Executive Vice President of Asset Protection and Risk Management for Trump Entertainment Resorts World-Wide. During my employment with Trump Entertainment, the company owned or operated three large casino/hotel resorts with over nine million square feet of structure employing approximately eight thousand in-house employees in Atlantic City, New Jersey and also managed three other gaming operations located in Palm Springs California, Gary Indiana, and on Canouan Island in the Grenadines. During my career I’ve had the responsibility of designing, supervising, and managing security plans for numerous special events, concerts, retail operations, gaming operations, hotel complexes, food and beverage outlets, nightclubs, parking structures, executive protection programs, aviation operations, transportation systems, executive residences, warehouse facilities, and administrative offices. I’ve been responsible for protecting human and physical assets such as high profile individuals, casino owners/families, entertainers, and individuals carrying large amounts of cash, foreign dignitaries, professional athletes, corporate executives, and famous personalities. I’ve supervised, overseen, audited, and developed security measures for the protection of people, cash, cash equivalent valuables, art, executive housing, vehicles, data, aircraft, and precious metals while stationary and in transit. In addition to my security and asset protection experience, while at Trump I’ve had the additional responsibility of overseeing the insurance and risk management programs for the Atlantic City, New Jersey and Gary, Indiana casino/resorts and corporate aviation and transportation programs.

Since leaving Trump in 2010, I have operated my own security consulting business and have delivered my services to, and on behalf of public, semi-public, corporate, and private clients from varying sectors including the legal community. Sectors that I’ve served as a consultant are; cash-in-transit (CIT) & cash processing/vaulting, healthcare, public safety, gaming, publishing, and leisure entertainment.

Over the course of my career, I have developed an in depth understanding of security applications, target hardening applications, asset protection techniques, and security force administration through practical experience, education, trade associations, public sector interaction, and professional certification.

Throughout the course of my employment I have been required to testify in numerous criminal and civil trials representing the various entities that have employed me. I am a high school graduate, possess a Bachelor of Arts degree from Fairleigh Dickinson University, possess an American Society for Industrial Security International (ASIS) Certified Protection Professional Credential, am a member of the International Association of Professional Security Consultants (IAPSC), a Tactical O.C. Instructor, a UNLV/DHS Soft Target Terrorism Instructor, an Instructor for the New Jersey Office of Homeland Security and Preparedness/NJSP Intelligence Academy, and a 2011 Graduate of the FBI Citizen’s Academy. From 2005-2010 I held a United States of

America Federal Secret Security Clearance. I am a member in good standing of ASIS, the International Association of Professional Security Consultants (IAPSC) a Member of the International Homicide Investigators Association, In 2008, I became, a participating member of the United States Department of Homeland Security's Commercial Sector Coordinating Council-Casino Gaming Sub-Sector, and have been a frequent advisor to local, county, state, and federal agencies regarding hospitality security, gaming/ resort operations, gaming/resort/security, nightclub operations, special event security, executive protection, violence in the workplace, and soft-target critical infrastructure protection.

Overview

This matter is a claim for damages brought by two plaintiffs, John T. Lamont, and Preston Poulter against defendant Ethan Van Sciver regarding allegations that Van Sciver slandered, endangered and communicated falsehoods about Poulter and Lamont which included falsely calling Poulter a "Pedophile" and Lamont a "Child Pornographer" during a YouTube talk show on April 25, 2021.

Professional Opinions

Based on the evidence presented and the reference materials as listed above, my work experience, professional certification, formal education, and document review it is my opinion that:

1. The labelling of an individual as a "Pedophile" or a "Child Pornographer" and communicating the label to others exposes the labeled individual to the possibility "Hate" and "Vigilante" crime by assailants regardless of whether the assertion is true or false.

"Every year thousands of men and women are targeted and attacked because of their race, religion, ethnicity/national origin, disability, or sexual orientation." ¹

2. "Hate" crimes are often committed by assailants who have no known connection or relationship to the victim other than the mere perception or knowledge that the victim possesses a proclivity or is someone within a deviant category that the assailant finds oppositional to their own beliefs and morals.
3. Victims, associates, and relatives of sex crime victims, including those within the category of "Pedophilia", have been known to commit acts of violence against known, publicized or perceived pedophiles.
4. The labelling of, and communication that Preston Poulter and John Lamont as "Pedophiles" and "Child Pornographers" placed both men at risk of "Hate Crime" violence.
5. The nature of the business conducted by Preston Poulter and John Lamont, being highly publicized and famous comic book authors/experts/businessmen requires them to be in close proximity and amongst thousands unknown and members of the general public at comic book industry tradeshow and events.
6. Many of the thousands of attendees at events where Preston Poulter and John Lamont conduct business wear costumes including masks at venues that typically do not require attendees to be screened for weapons.
7. Due to the potential of being targeted for violence by oppositional individuals, vigilantes or victim, Preston Poulter and John Lamont are in need of an all-encompassing comprehensive security program.

¹ Criminal Violence Page 135

8. The Security Program which is recommended for the protection of Preston Poulter and John Lamont include the following components which need to be implemented for each man.
 - a. A residential Target-Hardening and Physical Protective System.
 - b. A 24-hour residential Armed Executive Protection Specialist.
 - c. A travelling Armed Executive Protection Specialist and an Armed Countermeasures Trained Driver.
 - d. An occupational Armed Executive Protection Specialist for all trade shows, appearances, and events.

Note: The following cost estimates are based on the 2022 ASIS National Independent Security Contractor Expense Survey and actual costs may vary based on state, country and peak/surge capacity and certain variables such as the existence of holiday or special circumstance (large crowd fees) fees for armed protection personnel.

Preston Poulter and John Lamont each require a security program which include the following components.

9. The Residential Target Hardening and Physical Protective System includes:
 - a. An 8 camera CCTV system with live remote and on-site security company monitoring capability. Estimated cost installed \$14,000, and monthly live and alarm monitoring fee of \$500.
 - b. A hardwired residential burglar alarm system with duress capability and alarm company monitoring including 1 control panel, three key-pads, 18 window contacts, 2 door contacts, 1 garage door contact, 4 duress alarm fobs, 1- exterior annunciator, 1 interior annunciator, 1 dedicated telephone line, 1 cellular back-up communicator. Estimated cost installed \$8,000 and monthly monitoring fee of \$150.
 - c. Shatterproof/blast resistant window film on all exterior windows, 18 windows at \$500/per window,
 - d. High security & copy proof door lockset for 3 entry doors \$500 each installed.
 - e. Roton Hinge/Bullet Resistant doors and frames for front door, rear and side doors and frames. \$3,000 each installed.
 - f. Perimeter fencing with access-controlled pedestrian and roll-back driveway gates. \$18,000
 - g. Intercom speaker system with remote access by residence or alarm monitoring company for exterior fence pedestrian gate/driveway gate \$2,500.
10. The cost of the in-transit Armed Executive Protection Specialist \$65/Hour and estimating 20 annual tradeshow/events for each plaintiff while traveling to encompass an estimated 320 manhours averaging 16 hours for each round trip for an estimated \$20,800 annual expense,
11. The cost of a Countermeasures Trained Armed Driver is \$45/hour and estimating 20 annual tradeshow/events traveling to encompass an estimated 320 manhours averaging 16 hours for each round trip for each plaintiff is estimated to be \$14,400.
12. The cost of a 24 hour a day, 7 day a week Armed Executive Protection Specialist for each residence is estimated to be \$569,400 annually based on an hourly rate of \$65.

13. The cost of engaging professional services to obtain permits for the necessary Residential Target Hardening and Physical Protective System is estimated to be \$5,000 for each household.

Conclusion:

I conclude based on my professional experience in the security field and knowledge of the security standards and requirements for Asset Protection that the threat of violence posed to Preston Poulter and John Lamont are clear and present dangers due to each being labeled “Pedophiles” and “Child Pornographers”. Due to the labelling of the labeling of Preston Poulter and John Lamont each man now require a continual residential security program, and an in-transit and occupational security program for all instances of travel.

I present these opinions and conclusions within a reasonable degree of certainty within the Security Industry and reserve the right to amend or add an addendum to this report upon receipt of additional evidence.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Richard M. Santoro". The signature is fluid and cursive, with the first name "Richard" being more prominent and stylized than the last name "Santoro".

Richard M. Santoro C.P.P., Managing Member